

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

KAREN NASH, M.D.,)
)
Plaintiff,) No. 08 C 3648
)
vs.)
COUNTY OF COOK,)
)
)
Defendant.)

INITIAL STATUS REPORT

A. NATURE OF THE CASE

1. **JURISDICTION** - Jurisdiction of this Court is invoked pursuant to 28 U.S.C. §§451, 1331, 1337, 1343, and 1345. This action is authorized pursuant to Title VII, 42 U.S.C. §2000e, et seq., and the Equal Pay Act, 29 U.S.C. §206 (d)(1).

2. **VENUE** - The employment practices hereafter alleged to be unlawful were committed within the jurisdiction of the United States District Court for the Northern District of Illinois, Eastern Division.

3. **NATURE OF CLAIMS**

Plaintiff, Karen Nash, M.D. alleges that Defendant, County of Cook (hereinafter "Cook County"), violated Title VII of the Civil Rights Act of 1964, as amended and the Equal Pay Act, 29 U.S.C. § 206 (d)(1). Her allegations include: (1) disparate (worse) treatment based upon her race and sex and unequal pay (she was paid less than comparable and subordinate White/Male employees); and (2) hostile work environment.

4. **RELIEF SOUGHT** The facts will show that damages and injunctive relief should be granted.

(a) **INJUNCTIVE RELIEF** – Defendant Cook County should be enjoined from further discrimination because of Race and Sex. Defendant Cook County should be enjoined from paying similarly situated Black and Female employees (physicians) less than White and Male employees.

(b) **DIFFERENTIAL AND BACK PAY (TBD)** as follows:

➤ Differential (TBD) between what Plaintiff earned for past two (2)

years and what similarly situated non-Black and male Division Chiefs

- Back Pay, to April 13, 2007, at differential rate
- Liquidated Damages (TBD)
- Lost Benefits, including but not limited to malpractice insurance, disability, medical insurance and pension benefits

COMPENSATORY & PUNITIVE DAMAGES OF \$350,000.00

- Race Discrimination
- Sex Discrimination
- Retaliation

LEGAL FEES & COSTS: TBD

5. **PARTIES:** Counsel for Defendant Cook County has accepted service of the First Amended Complaint for Cook County.

6. **Major Legal Issues:** Whether Defendant's violated Title VII, and the Equal Pay Act;

B. DRAFT SCHEDULING ORDER

- All parties shall be joined by August 30, 2008.
- Pleadings may not be amended after September 30, 2008
- Discovery shall be completed by January 31, 2008

C. TRIAL STATUS: Plaintiff has requested a jury trial. Probable length of trial is fifteen (8) days.

D. CONSENT: Plaintiffs and Defendants agree to proceed before a Magistrate Judge for all proceedings, including trial.

E. SETTLEMENT: Plaintiff tendered a settlement demand contemporaneously with the filing of this Status Report. Defendant has not had the opportunity to reply as yet.

RESPECTFULLY SUBMITTED
BY:

S/LINDA CARROL CHATMAN
LINDA C. CHATMAN

RESPECTFULLY SUBMITTED
BY:

S/Jamieson B. Bowman
JAMIESON B. BOWMAN